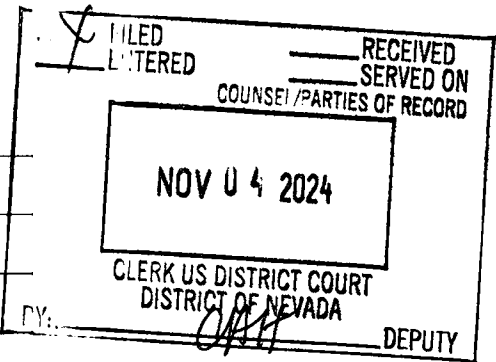


1 Your name: Richard Fried
2 Address: 5075 Eldora Ave #2
3 LV NV 89146
4 Phone Number: 702-970 1828
5 E-mail Address: Richard@EDENHOLISTICS.COM
6 Pro se



7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9
10 EDEN FOODS INC.

11
12 Plaintiff,

13 vs.

14 EDEN HOLISTICS LLC
15
16
17
18 Defendant.

Case Number: 24-CV-1574-GMN-NJK

MOTION TITLE:

TO EXTEND TIME

19
20
21 I. INTRODUCTION

22 [Briefly explain who you are and summarize what you are asking the court to decide.]

23 As the owner of EDEN HOLISTICS I am kindly asking
24 your Honor US DISTRICT COURT OF NEVADA for a ONE TIME
25 60 day EXTENSION. EDEN FOODS IS COMING AFTER 200 plus
26 COMPANIES NAMED EDEN Stating only they CAN use the NAME
27 EDEN. THIS 60 days will give me enough time to find the
28 right attorney representation. Also I need the extra time to

reach out to the many other companies dealing with the same case. I myself have filed opposition paperwork but am not allowed to represent myself. This 60 days is upmost necessary to do enough research and find the correct attorney.

II. ISSUES TO BE DECIDED

[Write each question or request that you are asking the court to decide in this motion. There may be one issue, or more. See the instructions for examples.]

1. Asking the court to kindly allow us a 60 day continuance to find a attorney who is the correct fit for this case and is not costly.

2. Asking the court to grant us 30 days after we find attorney to prepare case for hearing.

3. As my Aunt who is like a mother to me is in the hospital I am flying out of town November 5th 2024 coming back Nov 28th 2024.

4. _____

5. _____

III. MEMORANDUM OF POINTS AND AUTHORITIES

A. Statement of Facts

[Write the facts relevant to the motion. Add more pages as needed. At the end of each sentence, write where evidence of that fact can be found. See the instructions for more detail.]

1.1) Asking the court for this 60 days is highly important so we may have not just Adequate research but to Find an attorney that the Company can afford and is the right person to represent EDEN HOLISTICS LLC. We are a new company that does a lot of work in the community working with Parkinsons, Autism and Troubled at risk youth primarily as well as many other healing modalities. Those outreaches and expenses of marketing etc costs of starting a new business is the reason we need enough time to Find the right Attorney that is a good fit and mostly ONE we can afford going forward protecting our Healing company from wrongful attacks.

B. Argument

[You should have an argument section for each issue that you listed on page 2. Explain why the court should rule in your favor on each issue. Provide facts and case law or statutes if you have any. Add more pages as needed, keeping in mind the applicable page limits in the instructions.]

2.1 We are asking for 30 days after we find attorney so we may have enough time for research and enough time read out to the many other companies dealing with the same case. This time I believe is necessary so we can Adequately prepare our defense.

3.1 My Aunt is sick in the Hospital in Hungary, Budapest I will be out of Town for the time I would be seeking Attorney representation. This is why I Am ASKING for 60 days NOT 30 days this way when I return on 11-28-24 I still HAVE ENOUGH TIME TO FIND Representation.

1 While I Am IN Budapest, Hungary I Am Scheduled
2 NOV 8th & NOV 11 For dental Surgery. These events
3 were already pre booked before I received the letter
4 to Find attorney due to NOT being able to represent myself.
5 I attached Copies of my Airline ticket and can also
6 provide Dental Surgery Post CANCEL proof when I return
7 OR CAN EMAIL Soon AS I receive procedure in Budapest
8

9 Also I attached my ticket for February 22nd
10 - MARCH 20 For my Flight IN 2025 IF It is possible
11 to not schedule any court dates between those dates
12 AS I will be handling Affairs from my FATHER PASSING
13 INHERITANCE Selling Family home / Court matters IN Budapest.
14

15 Thank you for your Consideration your Honor
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28

1 Thank you your Honor for reading and
2 assessing our case and allowing us to prepare adequately
3 for this case. We spend every day trying and truly
4 helping make a big difference in our Client, Family & Friends lives.
5

6 There are many individuals and pets that highly depend on
7 us to help them. We want to be able to give our all into
8 this case as we know that many people and pets would suffer
9 if Edon Holistics was not available for their Healing needs/counsel.
10

11 Thank you for your time thoughtful consideration
12 [You must sign and date.]

13 Respectfully submitted,

14
15
16 Date: November 4th, 2024 Sign Name:

17 Print Name:

Richard Fried
Richard Fried

Flight to Amsterdam

Saturday 22 February 2025 - 16:15

Las Vegas, Harry Reid International Airport, LAS

KL0636 | Operated by KLM

Economy Class | Booking class: V

Boeing 777-200/200 ER

Amsterdam, Schiphol Airport, AMS

11:20 (D+1)

Meals on board: Meals

Flight to Budapest

Sunday 23 February 2025 - 12:30

Amsterdam, Schiphol Airport, AMS

KL1369 | Operated by KLM Cityhopper

| Booking class: L

295

Budapest, Ferenc Liszt International Airport, BUD

14:25

Meals on board: Snack

Flight to Amsterdam

Thursday 20 March 2025 - 06:30

Budapest, Ferenc Liszt International Airport, BUD

KL1362 | Operated by KLM

Economy Class | Booking class: L

Boeing 737-900 (winglets)

Amsterdam, Schiphol Airport, AMS

08:45

Meals on board: Snack

Flight to Las Vegas

Thursday 20 March 2025 - 12:25

Amsterdam, Schiphol Airport, AMS

KL0635 | Operated by KLM

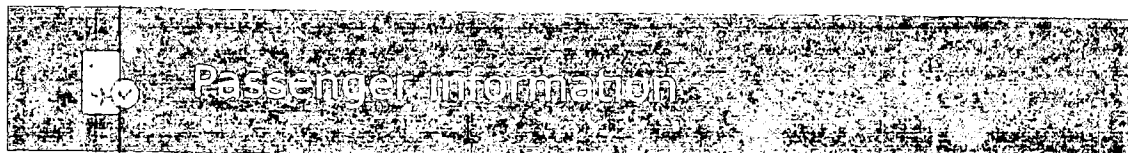
Economy Class | Booking class: V

Boeing 787-900

Las Vegas, Harry Reid International Airport, LAS

15:10

Meals on board: Meals





Flight to Amsterdam

Tuesday 5 November 2024 - 15:59

Las Vegas, Harry Reid International Airport, LAS

KL0636 | Operated by KLM

Economy Class | Booking class: R

Boeing 787-900

Amsterdam, Schiphol Airport, AMS

11:05 (D+1)

Meals on board: Meals

Flight to Budapest

Wednesday 6 November 2024 - 12:30

Amsterdam, Schiphol Airport, AMS

KL1369 | Operated by KLM Cityhopper

| Booking class: L

295

Budapest, Ferenc Liszt International Airport, BUD

14:25

Meals on board: Snack

Flight to Atlanta

Meals on board: Snack

Flight 28 Nov 2024 - 06:30

Thursday 28 November 2024 - 06:30

Budapest, Ferenc Liszt International Airport, BUD

KL1362 | Operated by KLM

Economy Class | Booking class: L

Boeing 737-900 (winglets)

Amsterdam, Schiphol Airport, AMS

08:45

Meals on board: Snack

Flight 28 Nov 2024 - 12:25

Thursday 28 November 2024 - 12:25

Amsterdam, Schiphol Airport, AMS

KL0635 | Operated by KLM

Economy Class | Booking class: R

Boeing 787-900

Las Vegas, Harry Reid International Airport, LAS

14:10

Meals on board: Meals

Flight 28 Nov 2024 - 14:10